

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

_____)	
JACKI PICK,)	
)	
<i>Plaintiff,</i>)	Civil Action No. 7:22-cv-00112-O
)	
v.)	
)	
BRADLEY JAY RAFFENSPERGER,)	JURY TRIAL DEMANDED
)	
<i>Defendant.</i>)	
_____)	

**PLAINTIFF JACKI PICK'S DESIGNATION OF EXPERT AND
DISCLOSURE OF EXPERT TESTIMONY**

Plaintiff, by and through undersigned counsel, hereby designates her expert witness in accordance with the Federal Rules of Civil Procedure and the Scheduling Order of this Court (Dkt. No. 24) and states that the following person may be called to provide expert testimony or present evidence at trial on behalf of Plaintiff.

RETAINED EXPERT

Marlena Alexia Haddad
550 Okeechobee Blvd., Apt. 812
West Palm Beach, FL 33401
Phone: (203) 910-8303

Ms. Haddad may be called to testify on the following topics: 1) why and how the defamatory statements at issue and their repetition in and by the media would affect Plaintiff's prospective opportunities of seeking political appointments within the executive branch of the federal government; 2) policies and procedures involved in selecting political appointments within the executive branch of the federal government; and 3) any other subjects or opinions referenced

in her report or in subsequent deposition testimony, including reasonable inferences arising therein. Any necessary report, curriculum vitae, and testifying history will be produced to Defendant.

Plaintiff reserves the right to call any expert designated by Defendant or called by Defendant at hearing or trial. Plaintiff further reserves the right to solicit testimony from any person identified by Defendant as a fact witness in this case, which may require such witness to rely upon their specialized knowledge, training, experience, education, or expertise in a particular filed or which may be considered “opinion” testimony. Plaintiff reserves the right to supplement this designation. Plaintiff also reserves the right to designate additional experts and Plaintiff’s expert(s) reserve(s) the right to supplement, amend, or modify any of the opinions expressed in reports as additional information may become available through discovery and at trial.

Dated: July 17, 2023

Respectfully Submitted,

DHILLON LAW GROUP, INC.

/s/ Matthew Sarelson

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Local Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July 2023, I electronically transmitted the attached document using the CM/ECF System for filing.

/s/ Matthew Sarelson
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